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Attorneys for Defendant Elon Musk

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

GIUSEPPE PAMPENA, on behalf of
himself and all others similarly situated,

Plaintiff,

vs.

ELON R. MUSK,

Defendant.

CASE NO. 3:22-CV-05937-CRB

**DEFENDANT ELON MUSK'S
ADMINISTRATIVE MOTION TO SEAL
PORTION OF JOINT LETTER TO
COURT**

Judge: Hon. Charles R. Breyer

Magistrate Judge: Hon. Donna M. Ryu

Under Civil Local Rule 7-11 and 79-5(c) Defendant Elon Musk (“Defendant”) hereby moves the Court to seal portions of the documents listed below and filed herein.

Material to Be Filed Under Seal Under 79-5(c)

Document	Description	Designating Party
Excerpts from the deposition of Defendant, dated May 7, 2025	Highlighted portions of the transcript discuss Defendant’s personal information that is also referenced in Paragraph 3 of the joint letter	Defendant
Parties’ Joint Letter Brief re: Spiro Motion to Quash	Paragraph 3 of Defendant’s portion of the joint letter	Defendant

Defendant seeks to seal Exhibit 1 and Paragraph 3 of the his portion of the parties’ joint letter filed contemporaneously herewith. On its face this Exhibit and Paragraph contain “personal information,” the confidentiality of which “outweighs the presumption in favor of public access to court records.” *See California Spine & Neurosurgery Inst. v. United Healthcare Ins. Co.*, 2021 WL 1146216, at *3 (N.D. Cal. Feb. 12, 2021). “The public has a minimal interest in [such] typically private and confidential [information].” *Hendricks v. Aetna Life Ins. Co.*, 2019 WL 9054346, at *4 (C.D. Cal. Nov. 7, 2019).

Defendant’s personal information will be made publicly available if sealing is denied. Only the specific paragraph discussing this confidential material is redacted from Defendant’s portion of the joint letter as the least restrictive means to preventing the public disclosure of this information.

This motion complies with Civil Local Rules 7-11 and 79-5, and the following attachments accompany this motion:

1. The Declaration of Stephen Broome in Support of this Motion; and
2. A Proposed Order that lists in tabular format all material sought to be sealed.

1
2 DATED: May 12, 2025

QUINN EMANUEL URQUHART &
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4 By /s/ Stephen A. Broome

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on all counsel of record electronically or by another manner authorized under FED. R. CIV. P. 5(b) on this the 12th day of May, 2025.

QUINN EMANUEL URQUHART &
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By /s/ Emily Couture

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Attorneys for Defendant Elon Musk

ATTESTATION

Pursuant to Civil L.R. 5-1, I attest under penalty of perjury that concurrence in the filing of this document has been obtained from the other signatories herein.

By /s/ Emily Couture

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